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February 27, 2008

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**By Federal Express**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 30554

Attn: Chief, Media Bureau

**Re: Ragland Telephone Company, Inc. and Ragland Long Distance, Inc.'s Annual  
47 C.F.R. § 64.2009(e) CPNI Compliance Certification  
EB Docket No. 06-36**

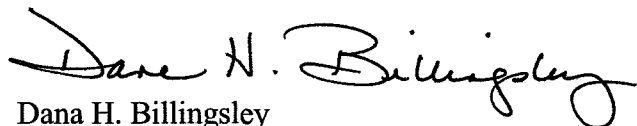
Dear Ms. Dortch:

On behalf of Ragland Telephone Company, Inc. and Ragland Long Distance, Inc., we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also filed a copy of this Certification electronically in EB Docket No. 06-36 and have provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Ragland Long Distance, Inc.*  
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Enclosure

cc: Tim Ford  
FCC Enforcement Bureau  
Best Copy and Printing, Inc.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 27, 2008

Name of company covered by this certification: Ragland Telephone Company, Inc. and Ragland Long Distance, Inc.

Form 499 Filer ID: 804558

Name of signatory: Peggy Dickinson

Title of signatory: President

In response to the Commission's Public Notice, DA 08-171 (released January 29, 2008), Ragland Telephone Company, Inc. and Ragland Long Distance, Inc. state as follows:

I, Peggy Dickinson, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. §§ 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in sections 64.2001, *et seq.* of the Commission's rules.

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
RAGLAND TELEPHONE COMPANY, INC. AND  
RAGLAND LONG DISTANCE COMPANY, INC.**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (hereinafter, collectively "Ragland") files the following statement of compliance with the requirements set forth in 47 C.F.R. §§ 64.2001, *et seq.* on behalf of Ragland:

1. I have personal knowledge that Ragland has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Ragland obtains written approval for the use of its customers' CPNI and that Ragland has notified its customers of their right to restrict Ragland's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Ragland has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. §§ 64.2001, *et seq.* and that Ragland has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Ragland implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Ragland maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Ragland retains all such records for a minimum period of one year.

6. I have personal knowledge that Ragland has established a supervisory review process regarding Ragland's compliance with outbound marketing situations and that Ragland maintains records of such compliance for a minimum period of one year. Ragland's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Ragland has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 27<sup>th</sup> day of February, 2008.

RAGLAND TELEPHONE COMPANY, INC.  
RAGLAND LONG DISTANCE COMPANY, INC.

By:



Peggy Dickinson  
President